

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
Civil Action No. 3:22-cv-630-MOC-DSC

SARA BETH WILLIAMS, BRUCE)
KANE, JASON YEPKO, GUN OWNERS)
OF AMERICA, INC., GUN OWNERS)
FOUNDATION, GRASS ROOTS NORTH)
CAROLINA, and RIGHTS WATCH)
INTERNATIONAL,)

Plaintiffs,)

v.)

SHERIFF GARRY MCFADDEN,)
in his official capacity as)
Sheriff of Mecklenburg County)
and the MECKLENBURG COUNTY)
SHERIFF'S OFFICE)

Defendants.)

SUPPLEMENTAL DECLARATION OF PAUL VALONE


1. My name is Francis Paul Valone I. I am a U.S. citizen and resident of North Carolina. I make this declaration in support of Plaintiffs' Complaint for Declaratory and Injunctive Relief. Unless otherwise stated, I make this declaration based on personal knowledge. If called as a witness, I can testify to the truth of the statements contained herein.
2. In my previous declaration filed with Plaintiffs' Complaint, I explained that many of the members and supporters of Grass Roots North Carolina ("GRNC") are being

irreparably harmed and have had their Second Amendment rights infringed because they have not had their permits issued timely, but rather have experienced significant and unconstitutional delays at the hands of Defendants.

3. In Defendant's Response Brief filed January 10, 2023, Defendants explain that they have now issued the CHPs for the three named individual Plaintiffs in this case, arguing that irreparable harm no longer exists to any of the Plaintiffs.
4. On the contrary, GRNC has continued to hear from its members and supporters in Mecklenburg County, who continue to experience significant delays in the CHP permitting process due to Defendants' actions. For example, one person completed the application process on August 4, 2022 (more than five months ago), but has yet to receive a CHP. Another person reports having now waited more than 13 months without receiving a CHP. It is my understanding that one or more of GRNC's members and supporters who continue to be irreparably harmed by Defendants are also member(s) of Plaintiff Gun Owners of America, Inc.
5. Until Defendants are forced to conform their actions to the Second Amendment, GRNC's members and supporters will continue to be irreparable harmed, and GRNC will continue to litigate on their behalf to defend their rights.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 16, 2023



Paul Valone